

## All COR ISO Recommendations

### Latent Condition, Seismic and ISS

Friday, October 12, 2012 12:40:33 PM

Type	Rec #	ABU	Unit	Year (I/R)	LC or ISS Question #	LC Question ISS Question Seismic Area	Observation	Recommendation	Resolution	Duc Date	Assigned To	Status
Latent Condition	550	RLOP	GRU	2009	1-5	Do operators have sufficient knowledge to safely operate or shutdown the unit in emergency situations where they must assume manual control?	There is concern that the operators do not have the opportunity to run the plant in non-optimized mode	Recommend that simulator be developed that accurately reflects current plant operation, or provide the opportunity for operators to run plant in non-optimized mode for some period of time.	The LNF simulator at the Vista Center is currently being upgraded to match current plant operation. Furthermore, RLOP Control Board Operators frequency run the plant in manual during emergencies and upsets (ex: loss of 8 S/C or heavier Cracker feed resulting in severe base oil viscosity changes). The LNC is also run in manual to execute LNC 110RLV and UCBO block switches.	7/9/2010	Siebert, Matthew J.	Completed
Latent Condition	551	RLOP	GRU	2009	3-15	Are all equipment labels located close to the items that they identify?	RLOP GRU and Flare exchangers and vessels labeling should be re-stenciled	Survey RLOP GRU and Flare exchangers and vessels labeling and re-stenciled where necessary.	Had all vessels, exchangers and columns labled with big letters.	7/9/2010	Congdon, Gene E.	Completed
Latent Condition	552	RLOP	GRU	2009	3-5	Are adequate process vents and drains available?	The number and location of process vents and drains are adequate. However, some vents and drains are not connected to relief and may cause release of sour stock to atmosphere.	Evaluate the need to connect GRU vents and drains to relief system, and correct as necessary.	These vent and drain connections are sparingly ever used and we would continue to generate work orders to install temporary piping in the event these vents or drains are needed for maintenance activities.	12/1/2009	Seidlitz, Michael R.	Completed
Latent Condition	553	RLOP	GRU	2009	4-69	Are the control building air conditioning and pressurization adequate to prevent intrusion of toxics, flammables, or corrosive contaminants (if applicable)?	There has been an H2S odor in the building during a release.	Verify that the HPCC pressurization system: is designed to prevent intrusion of toxics; functions according to design; is properly maintained.	Confirmed that there is a positive pressure on the HPCC of ~0.25 inches of water. There are pressure indicators at the interior and exterior of each exit.	7/9/2010	Slaughter, Joseph M.	Completed
ISS	6388	RLOP	GRU	2009	3F1	Change process conditons to avoid handling flammable liquids above their flash point?	Samples are run through coolers. Materials handled at flash point or above are normally contained.	Propane freeze test releases propane to atmosphere through a small orifice for three minutes once per shift. Consider alternative methods to determine water content of propane.	The flow rate of propane through the orifice was evaluated using information from the manufacturer and it was determined that the amount of propane released is small enough that it does not exceed any environmental limits.	3/31/2010	Estadt, Garrett R.	Completed

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ISS	6412	RLOP	GRU	2009	4A13	Electrical feed spread over independent or emergency sources?	No emergency source of electricity available. All power supplied by PG&E (and Cogen?). Within GRU, power is distributed on two independent buses.	EOM Chapter 7 description of electrical system is not current and accurate. Review and update electrical system portion of EOM to reflect current operations.	<p>RLOP still has emergency power available as backup power to all the equipment listed in all chapter 7 descriptions.</p> <p>This was verified with utilities in person and also going over drawings. See e-mail below...</p> <p>From: Fitzgerald, Sherry (SHMF) Sent: Tuesday, February 02, 2010 10:08 AM To: Barthel, John (JJ8J) Cc: Sands, John (SAJP) (JohnSands) Subject: RE: Does RLOP have emergency power?</p> <p>John: basically, your normal source of power is from #4 substation, there is still an RLOP emergency feeder, which would be your alternate, back up source which is fed from #1 Power Plant and #1 Power Plant is fed from Cogen. The "golden box" no longer exists. There is an electrical load shed scheme that has RLOP on Tier 2 load shed. The load shed scheme can be accessed on U&amp;E's EOM page that gives details on RLOP plants that will be shut down if Tier 2 level is achieved. Give me a call and I will come by to explain on the One Line diagram and show you how to access the Load shed in the EOM if needed.</p> <p>Sherry</p>	7/9/2010	Barthel, John J.	Completed
ISS	6435	RLOP	GRU	2009	5B1	Can materials be transported in less hazardous form; in a safer transport method; or by a safer route?	Spent caustic could be more safely transported via pipeline. There has been an incident with personnel exposure within the past five years.	Investigate the possibility of transporting spent caustic via pipeline.	<p>Not deemed feasible to build a pipeline. Safety measures, including input from HES, have been put in place to address the one incident that occurred. PPE requirements are established when handling the transfer of this material.</p>	12/1/2009	Seidlitz, Michael R.	Completed